

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA	)	<u>I N F O R M A T I O N</u>
	)	
	)	Case No. 3:08-cr-28
v.	)	
	)	Violation: 18 U.S.C. §§ 1341 and 2
	)	
ADEKUNLE OLUFEMI ADETILOYE	)	

**Mail Fraud**

The United States Attorney Charges:

**Introduction**

1. The defendant, ADEKUNLE OLUFEMI ADETILOYE, is charged in this Information with participating in a scheme to defraud financial institutions out of money, acting with knowledge of the fraudulent nature of the scheme.

The scheme involved assuming the identities of unsuspecting consumers by using personal information surreptitiously obtained. The identities were used to open U.S. Bank Visa credit card accounts and other bank and credit card accounts in the unsuspecting consumers' names. After the account was opened, the address of record would be changed to an address controlled by ADEKUNLE OLUFEMI ADETILOYE or another participant in the scheme, resulting in credit cards, balance transfer checks, and other things of value being delivered to the new addresses. One or more participants in the scheme also incurred fraudulent charges on the accounts. These fraudulent offenses

were committed in the District of North Dakota as well as various locations in the United States and Ontario, Canada.

2. As part of, and to effectuate his scheme to defraud unsuspecting consumers and financial institutions, ADEKUNLE OLUFEMI ADETILOYE used the United States Postal Service, other commercial interstate carriers, and interstate wire facilities.

### **The Scheme**

3. On or about March 24, 2004, the Delaware Division of Corporations in Dover, Delaware, received a new document filing from Corporations USA, a corporate Registered Agent in Delaware, on behalf of Syspac Financial Services, Inc. via a two-page facsimile, resulting in Syspac Financial Services, Inc. being incorporated in the State of Delaware on or about March 24, 2004.

4. On or about April 19, 2004, ADEKUNLE OLUFEMI ADETILOYE, or another participant in the scheme falsely represented himself to be “Donald Douglas” and submitted an application for a Delaware business license to the Delaware Division of Revenue requesting a business license for Syspac Financial Services, Inc., a business purportedly to be involved in the “collection of debts” and “locating delinquent debtors.” This application resulted in the Delaware Division of Revenue issuing a business license to Syspac Financial Services, Inc., on or about April 26, 2004.

5. After on or about April 19, 2004, one or more participants in the scheme used the Syspac Financial Services, Inc. business license to obtain access to various

commercial databases. These commercial databases combine personal data sourced from multiple public and private databases for sale to the government and to the private sector. These databases contain personal information including names, addresses, social security numbers, and other sensitive data.

6. After on or about April 19, 2004, one or more participants in the scheme used information obtained from these commercial databases to fraudulently obtain more than one credit card by posing as another person without that person's knowledge or permission.

7. Between on or about March of 2004 and on or about August of 2007, in the District of North Dakota and elsewhere,

ADEKUNLE OLUFEMI ADETILOYE,

for the purpose of executing and attempting to execute the aforementioned scheme to defraud and to obtain money and other items of value by means of false and fraudulent pretenses, representations, and promises, did knowingly cause to be delivered by the United States Postal Service, and other commercial interstate carriers, according to the direction thereon, balance transfer checks, bank and credit cards, and other items of value, from Fargo, North Dakota, and elsewhere, to addresses that were directed to be delivered by one or more participants in the scheme and which were controlled by one or more participants in the scheme;

In violation of Title 18, United States Code, Sections 1341 and 2.

### **FORFEITURE ALLEGATION**

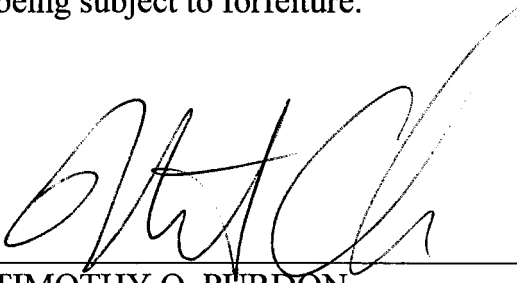
The felony offense alleged in this Information punishable by imprisonment for more than one year, is hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of 18 U.S.C. §§ 981(a)(1)(C), 982(a)(3), and 28 U.S.C. § 2461(c).

Upon conviction of this Information, the defendant, ADEKUNLE OLUFEMI ADETILOYE, shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(3), and 28 U.S.C. § 2461(c), all of his right, title, and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of 18 U.S.C. § 1341.

If any of the assets described above as being subject to forfeiture, pursuant to 18 U.S.C. § 1955(d), as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of said property described above as being subject to forfeiture.



for

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TIMOTHY Q. PURDON  
United States Attorney

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